

(16) Interrogatory 19 states: State whether you or someone on your behalf or otherwise at your request or direction prepared the Good Operator the Report attached hereto as Exhibit 14.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from Crowell, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(17) Interrogatory 20 states: State whether you published Exhibit 14 or otherwise cause it to be published online or otherwise. If so:

- a. identify the date, time, and location of such publication; and
- b. identify the reason for such publication.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(18) Interrogatory 21 states: State whether you distributed, published, or otherwise disclosed any letter you received from the Commission or anyone on its behalf on the hamjamming.com web page, any other web page, or in another forum. If so, for each such web page or forum used to publish the letter(s), identify:

- a. the web page or forum internet address on which each letter was published or distributed;
- b. the publisher of each letter;
- c. each person who submitted each letter for publication or posting;
- d. the title of the article or posting in which each letter appeared;
- e. the date when each article or posting was published or posted;
- f. explain why each letter was published or posted.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(19) Interrogatory 22 states: State whether you are the author of the article, "All Hams Need a Secret Jamming Location" that appeared on www.eHam.net on or about August 31, 2004. If so:

- a. explain why you wrote the article;
- b. identify each web page or forum to which you submitted the article;
- c. specify each date the article was published by or posted on, each web page or forum identified in subsection (b), above.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony and publications by Crowell that are related to amateur radio, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(20) Interrogatory 23 states: Identify any and all articles about amateur radio that you have written which have been published. For each such article:

- a. explain why you wrote the article;
- b. identify each web page or forum to which you submitted the article;
- c. provide each date the article was published by, or posted on, each web page or forum identified in subsection (b) above.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony and publications by Crowell that are related to amateur radio, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(21) Interrogatory 24 states: State whether you have ever had any communication with the Commission, its employees and/or staff regarding allegations that you engaged in deliberate interference to ongoing communications. If so, as to each such communication:

- a. state the date of the communication;
- b. state whether the communication was written or oral;
- c. identify each party to or person who participated in the communication;
- d. summarize the substance of the communication;
- e. state the purpose of the communication and any response thereto; and
- f. identify each witness to the communication.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from, publications by, and transmissions by Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners and the Commission, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(22) Interrogatory 25 states: State whether you have ever had any communication with the Commission, its employees and/or staff regarding a license renewal and/or vanity call sign application filed by you or on your behalf. If so, as to each such communication:

- a. state the date of the communication;
- b. state whether the communication was written or oral;
- c. identify each party to or person who participated in the communication;
- d. summarize the substance of the communication;
- e. state the purpose of the communication and any response thereto; and
- f. identify each witness to the communication.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without

merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners and the Commission, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(23) Interrogatory 26 states: State whether you have ever had any communication with the Commission, its employees and/or staff, regarding complaints received by the Commission about your allegedly unauthorized, improper, and/or illegal actions. If so, as to each such communication:

- a. state the date of the communication;
- b. state whether the communication was written or oral;
- c. identify each party to and person who participated in the communication;
- d. summarize the substance of the communication;
- e. state the purpose of the communication and any response thereto; and
- f. identify each witness to the communication.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners and the Commission, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(24) Interrogatory 27 states: State whether, on the morning of April 05, 2008 at 10:02:00 a.m., you posted a comment on the website at <http://hamfanz.blogspot.com/search/label/w6wbj>. If so: state whether the comment referenced "A high-ranking FCC employee, who is a ham, [who] is sympathetic to my case and wishes to remain anonymous" and, if so, identify the FCC employee to whom you so referenced. State further whether the comment also referenced another, male "FCC staff person with whom I have been speaking" and, if so, identify that FCC staff member.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners and Commission staff, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(25) Interrogatory 28 states: Describe specifically and in detail all steps you have taken in an effort to eliminate interference in response to the Commission letter to you dated August 21, 2000.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence, absent a preliminary showing that the complaints in question constitute a Part 97 violation.

Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from Crowell,

admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners and the Commission, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct and exculpatory evidence. As discussed in Paragraph A.2, above, Crowell's objection that demonstration of a Part 97 violation is required before he needs to respond to the Interrogatory has no legal basis as an objection and Crowell offers no case law or rule to support it. Moreover, in setting forth his "objection" Crowell is actually presenting what purports to be an argument regarding legal issues. Such argument, even if factually or legally substantiated (which the Bureau contends it is not), provides no rationale or basis to preclude the Bureau from conducting discovery on the issues set forth in the HDO. The standard for discovery, which supports the Bureau's ability to seek discovery, is well-settled: "It is not ground for objection . . . that the testimony will be inadmissible at the hearing if the testimony sought appears reasonably calculated to lead to the discovery of admissible evidence." 47 C.F.R. § 1.311(b). Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(26) Interrogatory 29 states: State whether you ever volunteered to refrain from using the 3820 frequency. If so:

- a. describe specifically and in detail the circumstances by which you agreed not to use that frequency;
- b. state when the agreement was made;
- c. identify each person with whom you agreed not to use the frequency;
- d. state whether the agreement was written and, if so:
 - i. state the title, if any, of the agreement;
 - ii. state when the written agreement was executed;
 - iii. identify each party to the written agreement;
- e. provide the date when you last broadcast over the 3820 frequency;
- f. state whether you continue to refrain from using the 3820 frequency.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(27) Interrogatory 30 states: State whether you were ever instructed to not use the 3820 frequency. If so:

- a. describe specifically and in detail the circumstances by which you were instructed to refrain from using that frequency;
- b. state when the instruction was given;
- c. identify each person(s) who instructed you not to use the frequency;
- d. state whether that instruction was written and, if so, for each written instruction:
 - ii. provide the date(s) the instruction was written and sent;
 - ii. provide the date the instruction was received;
 - iii. identify each person who signed the instruction.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy

objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(28) Interrogatory 31 states: State whether you have ever referred to W. Riley Hollingsworth ("Hollingsworth") during an on-air transmission(s), on the hamjamming.com web page, in any internet blog, in correspondence, or otherwise as any or all of the following: "Princess," "Hollywood," "Mr. Hollywood," "Riley Hollywood," "Tsarina Hollywood," "Tsarina," and/or "Colonel Klink-Hollywood." If so, for each such name used:

- a. state the name;
- b. provide each date when such name was used;
- c. describe the type of communication containing each such name (*i. e.*, letter, blog, etc.);
- d. describe the circumstances in which you used the name;
- e. explain specifically and in detail your reason for doing so.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. As grounds, Crowell argues:

Among other reasons for being irrelevant, the Interrogatory improperly equates, and therefore confuses, the actions of Riley Hollingsworth with the actions of the Commission. They are not the same because Hollingsworth does not speak for the Commission, since the Commission itself promulgated Part 97 but Hollingsworth's so-called "interpretations" thereof are entirely inconsistent with and contrary to Part 97's plain meaning. Therefore, whether or not Applicant respects Riley Hollingsworth is irrelevant to the issue of whether or not Applicant respects and follows the Commission's Rules.

Answers at No. 31.

Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Crowell's argument regarding Riley Hollingsworth has no legal basis and Crowell offers no case

law or rule to support it. Moreover, in setting forth his "objection" Crowell is actually presenting what purports to be an argument regarding legal issues. Such argument, even if factually or legally substantiated (which the Bureau contends it is not), provides no rationale or basis to preclude the Bureau from conducting discovery on the issues set forth in the HDO. The standard for discovery, which supports the Bureau's ability to seek discovery, is well-settled: "It is not ground for objection . . . that the testimony will be inadmissible at the hearing if the testimony sought appears reasonably calculated to lead to the discovery of admissible evidence." Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(29) Interrogatory 32 states: State whether in a blog posting on or about August 31, 2004, on www.eHam.net regarding "All Hams Need a Secret Jamming Location" you stated, "If we all set up SJL's [secret jamming locations], it would have the added advantage of actually giving Riley [Hollingsworth] something to do besides sending out his form letter warning notices, permit him to save a lot of money on Vaseline [sic], and give his right hand a well-deserved rest."

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony and written publications of Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(30) Interrogatory 33 states: State whether in response to a blog posting by "Goodbuddy" on August 31, 2004 (stating: "Yeah most of us have heard old Billy Boy's behavior on 3840. A fine example of how to harass and interfere with on going [sic] QSO's. The echo effects were nice Billy.") you responded by stating, "but how did you like Bilitznicklick the Martian... and The Creature from the Black Slacks Lagoon... I thought they were even better than the reverb! Man that Behringer DSP-2024 digital audio processor is a fantastic unit." If so" describe specifically and in detail what you are referring to by "Bilitznicklick the Martian" and "The Creature from the Black Slacks Lagoon."

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony and publications of Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(31) Interrogatory 34 states: State whether in response to an internet website posting on www.eHam.net. you sent an email to rinehard@troyst.edu ("Rinehard") on August 31,2004 at 20: 18:56 (EDT). If so:

- a. did you call Rinehard a "loser" or refer to his profession [professor of political science] as "bullshit artists," a "bunch of idiots" and/or other insulting terms in that email? If so, state each term used to describe Rinehard and his profession;
- b. Explain specifically and in detail each reason for your email to Rinehard and the remarks made in it;
- c. provide each email address used to send this email;
- d. provide each email address copied on this email;

- e. state whether you have ever corresponded or otherwise communicated with Rinehard. If so:
- i. provide the date of each such communication;
 - ii. provide the method used for each such communication (i.e., email);
 - iii. provide the text of each such communication. If the text is not available, provide a detailed summary of the communication, including, but not limited to, each insulting word or phrase used therein;
 - iv. If the communication was via email, provide:
 - a. each email address used to send the email;
 - b. each email address used for Rinehard;
 - c. the email address of each person copied on your email to Rinehard and an explanation regarding why you copied each individual on the email.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony and publications by Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(32) Interrogatory 35 states: State whether in response to a blog posting by NIVLQ on www.eHam.net regarding "All Hams Need a Secret Jamming Location" you, on September 4, 2004, stated: "[I]t's hard not to appear [like a know-it-all] by comparison to Tsarina Hollywood because she knows so little." If so, identify "Tsarina Hollywood."

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. his Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony and publications of Crowell, admissible evidence

regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(33) Interrogatory 36 states: State whether in response to a blog internet website posting by KK6SM on www.eHam.net regarding "All Hams Need a Secret Jamming Location" you, on September 6, 2004, stated, "[J]amming is not wrong! My authority for saying so is none other than Riley Hollywood himself. .. , He has informed several stations, in writing, that it is OK to jam other stations whom they feel are violating Part 97." If so, explain specifically and in detail why you stated that "jamming is not wrong." Identify the writings you are referring to in your blog response.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony and publications by Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(34) Interrogatory 37 states: State whether in a blog posting on or about September 9, 2004, on www.eHam.net regarding "Ford, you're right for once" you stated, "Yes, Ford, I do

have an agenda and I freely admit to it. I want to get the Tsarina's ass canned." If so, identify "Tsarina."

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony and publications by Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(35) Interrogatory 38 states: State whether in a blog posting on or about April 16, 2007, on www.eHam.net regarding "FCC Amateur Radio Enforcement Correspondence Posted" you stated, "I have made absolutely no changes in my operating habits or procedures as the result of the letters Mr. Hollingsworth has sent me, nor do I intend to make any such changes. Riley Hollingsworth is full of crap. I never listen to a thing he says. . . 'F' you, Riley!"

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony and publications by Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently,

Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(36) Interrogatory 39 states: State whether you have ever used equipment to mask, alter, or otherwise distort your voice during any transmission on any amateur radio frequency. If so, for each such transmission:

- a. describe specifically and in detail the nature and content of your transmission;
- b. state the frequency on which your transmission was made;
- c. state the date and time of your transmission;
- d. state the duration of your transmission;
- e. describe specifically the equipment used to mask, alter or distort your voice.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(37) Interrogatory 43 states: State whether you have ever transmitted over any amateur radio frequency profane or indecent language or otherwise cursed or swore at any time. If so, for each such occurrence:

- a. state the date and time of the transmission;
- b. state the frequency on which such transmission was made;
- c. state the duration of the transmission;
- d. describe with specificity the equipment used for the transmission;
- e. describe specifically and in detail the nature and content of such transmission.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein, since Part 97, §97.113(a)(4) prohibits only "obscene or indecent" utterances. Profanity is a religious term, a prohibition against which would violate the separation of church and state guaranteed by the First Amendment to the U.S. Constitution.

Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony and transmissions of Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Crowell's discourse regarding profanity has no legal basis as an objection and Crowell offers no case law or rule to support it. Moreover, in setting forth his "objection" Crowell is actually presenting what purports to be an argument regarding legal issues. Such argument, even if factually or legally substantiated (which the Bureau contends it is not), provides no rationale or basis to preclude the Bureau from conducting discovery on the issues set forth in the HDO. The standard for discovery, which supports the Bureau's ability to seek discovery, is well-settled: "It is not ground for objection . . . that the testimony will be inadmissible at the hearing if the testimony sought appears reasonably calculated to lead to the discovery of admissible evidence." Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(38) Interrogatory 47 states: State whether you have ever used the expression "fucktard," or any variation thereof, during any transmission at any time on any amateur radio frequency. If so, for each such transmission:

a. state the date and time of the transmission;

- b. state the frequency on which such transmission was made;
- c. state the duration of the transmission;
- d. describe with specificity the equipment used for the transmission;
- e. describe specifically and in detail the nature and content of such transmission.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony and transmission of Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(39) Interrogatory 49 states: State whether you have ever been informed by one or more amateur radio operators that you were or are not welcome to join a QSO. If so, for each such occurrence:

- a. state the date and time of the occurrence;
- b. state the frequency of the transmissions;
- c. identify the amateur radio operator(s) who were participating in the QSO at d. the time that you attempted to join it;
- e. identify the amateur radio operator(s) who told you that you were not welcome to participate in the QSO;
- f. state the reasons provided or otherwise known to you why the QSO participants did not want you to join the QSO;
- g. state your response(s) and action(s) after the participants in the QSO told you that you were not welcome to join the QSO.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from Crowell, admissible evidence regarding Crowell's

interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(40) Interrogatory 50 states: State whether you are aware of any occurrence in which your participation or attempted participation in a QSO was ever the cause of other amateur radio operators moving to other amateur radio frequencies to QSO. If so, for each such occurrence:

- a. state the date and time of the occurrence;
- b. state the frequency of the transmission;
- c. identify each amateur radio operator who was participating in the QSO at the time that you attempted to join it;
- d. identify each amateur radio operator who left the frequency after you attempted to join the QSO;
- e. identify each amateur radio operator who left the frequency to QSO on another frequency;
- f. state the frequency to which each QSO participant moved;
- g. describe in detail what action(s) you took in response to each QSO participant moving to another frequency to QSO.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from and transmissions of Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(41) Interrogatory 51 states: State whether you are aware of any occurrence in which you followed other amateur radio operators to another amateur radio frequency after being informed that you were not welcome in their QSO and/or after they moved to another amateur radio frequency. If so, for each such occurrence:

- a. provide the date and time of such transmission(s);
- b. state the frequency upon which the initial QSO was taking place;
- c. state each frequency to which the QSO moved to;
- d. state each frequency you moved to;
- e. identify each participant in the QSO;
- f. describe the reaction of each QSO participant to your initial attempt to join the QSO on the original frequency;
- g. describe the reaction of each QSO participant to your attempt to join the QSO on any or each subsequent frequency;
- h. explain in detail your reason(s) for following the QSO participants to any or each subsequent frequency.
 - i. describe what action(s) you took after following the QSO participants to any or each subsequent frequency and provide the reason(s) for each action.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(42) Interrogatory 52 states: State whether you made any amateur radio transmissions between the hours of 3:20 and 4:00 a.m. EDT, April 22, 2006 on the 3943 kHz frequency. If so, as to each transmission:

- a. describe specifically and in detail the nature and duration of the transmission;
- b. identify each participant to such transmission
- c. describe the reaction, if any, of each participant to the transmission.
- d. state whether the transmission interfered with ongoing amateur radio communications. If so, for each transmission made:
 - i. describe specifically and in detail the nature of each transmission that you interrupted;
 - ii. explain fully why you caused the transmission to interfere with ongoing amateur radio communications;
 - iii. identify each ham operator whose communications you interrupted.
 - iv. describe what steps, if any, that you took to cease causing the interference.

Crowell objects to this Interrogatory on the ground that it is irrelevant and not calculated to lead to the discovery of admissible evidence, absent a preliminary showing that the mere complaint constitutes a Part 97 violation. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from and transmissions of Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Crowell's objection that a Part 97 violation is required has no legal basis as an objection and Crowell offers no case law or rule to support it. Moreover, in setting forth his "objection" Crowell is actually presenting what purports to be an argument regarding legal issues. Such argument, even if factually or legally substantiated (which the Bureau contends it is not), provides no rationale or basis to preclude the Bureau from conducting discovery on the issues set forth in the HDO. The standard for discovery, which supports the Bureau's ability to seek discovery, is well-settled: "It is not ground for objection . . . that the testimony will be inadmissible at the hearing if the testimony sought appears reasonably calculated to lead to the discovery of admissible evidence." Consequently, Crowell's relevancy

objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(43) Interrogatory 53 states: If you did not interfere with ongoing communications during the time frame noted in Interrogatory No. 52, above, but did transmit communication on that frequency during that time frame, for each such transmission:

- a. describe specifically and in detail the nature and duration of the transmission;
- b. identify each participant to such transmission
- c. describe the reaction of each other participant to your transmission.

Crowell objects to this Interrogatory on the ground that it is irrelevant and not calculated to lead to the discovery of admissible evidence, absent a preliminary showing that the mere complaint constitutes a part 97 violation. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from and transmissions of Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Crowell's objection that a Part 97 violation is required has no legal basis as an objection and Crowell offers no case law or rule to support it. Moreover, in setting forth his "objection" Crowell is actually presenting what purports to be an argument regarding legal issues. Such argument, even if factually or legally substantiated (which the Bureau contends it is not), provides no rationale or basis to preclude the Bureau from conducting discovery on the issues set forth in the HDO. The standard for discovery, which supports the Bureau's ability to seek discovery, is well-settled: "It is not ground for objection . . . that the testimony will be inadmissible at the hearing if the testimony sought appears reasonably calculated to lead to the discovery of admissible evidence." Consequently, Crowell's relevancy

objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(44) Interrogatory 54 states: State whether you have ever registered or otherwise signed up any amateur radio operator, without his/her consent, to receive pornographic pictures, email, and/or other material. If so, for each such occurrence:

- a. identify the amateur radio operator you so registered
- b. provide the address of the amateur radio operator used during registration;
- c. state how you acquired the address of the amateur radio operator;
- d. provide the email address of each website to which you registered the amateur radio operator;
- e. describe with specificity and detail each type of material that you requested be sent to the amateur radio operator from each website and/or other location;
- f. describe specifically and in detail your reason for registering such amateur radio operator to receive pornographic material.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from and transmissions of Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(45) Interrogatory 55 states: State whether you have ever been banned from any internet forum or website. If so, for each such forum or website:

- a. identify the forum or website;
- b. state the date when you were banned;
- c. state the length of time you were banned;
- d. explain in detail each reason that you were banned;
- e. state whether you have been allowed to return to that forum or website;

- i. if not, provide each reason you have not been allowed to return to that website.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from and transmissions of Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(46) Interrogatory 56 states: State whether you have informed any amateur radio operator that he/she may be sued for publicly making unfavorable comments about an attorney who is licensed in California. If so, for each amateur radio operator told:

- a. identify the amateur radio operator;
- b. state the date and time of such communication;
- c. describe in detail the circumstances surrounding such communication;
- d. describe specifically and in detail the nature and content of such communication;
- e. explain specifically and in detail each reason for so informing the amateur radio operator;
- f. list each authority upon which you relied which is worded to specifically benefit attorneys;
- g. list each legal authority supporting such statement.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from and transmissions of Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to

Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(47) Interrogatory 57 states: State whether you sent emails on December 28, 2005 at 6:24 a.m. with the subject "KABA T-shirt" in which you stated: "Dear Friends: This is to officially announce the commencement of the 'Kick Art Bell's Ass' (signal-strengthwise[sic]) RF signal strength contest." If so, for each such email describe specifically and in detail what you were referring to in this email and your reasons for sending the email.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from and transmissions of Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(48) Interrogatory 58 states: State whether you sent an email with the subject of "What a sniveler!" to w71 w@direcway.com on June 7, 2006 at 6:30 a.m. If so:

- a. state the purpose for sending this email;
- b. identify who you sent copies of the email to and explain rationale for so doing;
- c. explain what you meant when you stated: "BTW, what CW frequency are you going to be on? My goon friends and I might want to join our QSO."

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from and transmissions of Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding Crowell's conduct, and evidence concerning Crowell's patterns of conduct. Consequently, Crowell's relevancy objection should be rejected and Crowell should be ordered to immediately answer the Interrogatory fully and completely.

(49) Interrogatory 59 states: State whether you sent an email with the subject "You no-good fuckin son of a bitch!" in which you stated, "Listen, John, you no-good fucking son of a bitch, I today received recordings of you on 3765 last night, repeatedly accusing me of jamming the frequency. This is a warning: you either knock off making such false allegations against me, or I'm going to take a trip down to you QTH and kick your ass! Understand fucktard? I have no intention of continuing to tolerate your lies and false allegations" to W6WFE@cox.net on Sunday, August 6, 2006 at 1:25 p.m. If so:

- a. state each reason why you sent this email;
- b. identify who you sent copies of the email to and explain rationale for so doing;
- c. state whether you have a copy of the recording to which you refer in the email.

Crowell objects to this Interrogatory on the ground that it is irrelevant, immaterial and not calculated to lead to the discovery of admissible evidence herein. Crowell's objection is without merit. This Interrogatory is reasonably calculated to lead to the discovery of admissible evidence and is designed to discover testimony from and transmissions of Crowell, admissible evidence regarding Crowell's interactions with other amateur radio operators and listeners, witnesses to Crowell's conduct as an amateur radio operator, admissible character evidence regarding